

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of)

Implementation of Section 19 of the)
Cable Television Consumer Protection)
and Competition Act of 1992)

Annual Assessment of the Status of)
Competition in the Market for the)
Delivery of Video Programming)

CS Docket No. 94-48

RECEIVED

JUL 29 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF SUPERSTAR SATELLITE ENTERTAINMENT

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REPLY COMMENTS OF SUPERSTAR SATELLITE ENTERTAINMENT

Superstar Satellite Entertainment ("Superstar") hereby submits these reply comments in response to the comments filed by various parties in this proceeding.

Introduction and Summary

The Commission commenced this proceeding in response to Section 19(g) of the Cable Television Consumer Protection and Competition Act of 1992 ("1992 Cable Act"), directing the Commission to annually report to Congress on the status of competition in the market for the delivery of video programming.¹ The comments filed generally reflect that the programming market is highly competitive. Despite the presence of robust competition,

¹ 47 U.S.C. § 548(g).

evidenced by the expansion of the HSD market, and the Commission's findings in its program access rulemaking proceeding that certain pricing differentials are permitted under the Rules, four distributors of programming to the HSD market repeat stale allegations of discrimination.² In fact, discrimination is not present in the HSD market.

These same distributors also argue that the Commission should adopt additional remedies, including an award of damages to prevent price discrimination.³ This argument is legally flawed and the Commission should adhere to its previous conclusion that a damage remedy is not appropriate for violations of the program access rules.

Because these arguments are misleading and without merit, they do not provide valid or credible material to assist the Commission in preparing its report to Congress.

I. Development of the HSD Market

²See comments of the National Rural Telecommunications Cooperative ("NRTC") as well as the joint comments of Consumer Satellite Systems, Inc., Programmers Clearing House and Satellite Receivers, Ltd. ("CSS"). These commenters restate arguments that price differentials between rates charged the home satellite dish market ("HSD") and other technologies are not justified. NRTC Comments at 17; CSS Comments at 3-5. Notably, neither the programmers themselves who compete against each other, nor the vast majority of the several thousand distributors and packagers who compete against the programmers as well as each other, have made these claims.

³NRTC comments at 11-12; CS Comments at 6.

Superstar is a "satellite broadcast programming vendor" within the meaning of Section 1000(g) of the Commission's Rules, 47 C.F.R. § 1000(g). Superstar uplinks and distributes four superstations, WGN-TV, KTLA-TV, WPIX-TV, and KTVT-TV for distribution to backyard dish markets. Superstar sells directly to home satellite dish ("HSD") owners possessing residential C-band TVRO earth station facilities. Superstar also sells directly to HSD owners by way of a number of agents and commissioned salesmen, including equipment dealers, equipment distributors, and third-party program packagers. United Video, a separate division but under common ownership with Superstar, participates in the uplink of these four superstations, and distributes them to facilities-based operators ("FBOs") such as cable, MMDS and SMATV operators.⁴

Program distribution to the HSD market was conceived and developed well after the FBO market had been established. Superstation distribution to HSDs is essentially a "retail" market for the programmers; programming is sold directly to consumers and no facilities-based intermediaries are (or could be) part of the programming delivery process. When the sales to HSDs began in 1987, there were *no HSD subscribers*. The risk taken by investing in the necessary sales, authorization, and customer service facilities occurred before any revenue stream from HSD even existed.⁵

⁴ In March 1987, United Video began selling superstation programming to the HSD market, first under its own name, subsequently under the name Superstar Connection. Through various internal reorganizations, the entity now providing HSD service is Superstar Satellite Entertainment.

⁵Previously, HSDs paid nothing for all unscrambled signals they were able to receive. With the advent of scrambling, it could not be predicted whether HSD owners would pay for

Today there are more than 60 programming services available nationally in the HSD market, from more than 40 national and regional programmers and third party packagers.⁶ In this highly competitive market, the marketing of HSD services is critical. While the cable market has matured somewhat, the full extent of HSDs' competition to cable is still emerging and the number of entities competing for the much smaller universe of HSD subscribers make marketing and advertising critical to the success of any HSD programming service. Indeed, this intense competition itself precludes price discrimination. The price differentials here are only reflective of the costs and technical differences in delivering services through various distributors. The differences between the operation of the HSD and cable markets have been covered in the comments in the program access rulemaking proceeding, as well as in two prior discrimination inquiries in which the Commission issued two separate reports.⁷

Superstar's rates charged to HSD distributors for reselling Superstar's programming services are lower than the rates charged individual HSD users, thus enabling

signals actually received or simply try to pirate them. Initially, equipment dealers and distributors refused to be part of the process, thus leaving Superstar with no option but to establish its operations and sell directly to consumers.

⁶Exhibit A, excerpted from the July 1994 issue of ORBIT© Magazine.

⁷See, e.g., First Report, Inquiry Into the Existence of Discrimination in the Provision of Superstation and Network Station Programming, 5 F.C.C. Rcd 523 (1989); Second Report, 6 F.C.C. Rcd 3312 (1991). The costs associated with serving the HSD market, as presented in the program access rulemaking, are set out *infra* in Section II.

the distributor to receive a commission for marketing the subscriptions.⁸ Essentially, the HSD distributor receives a discount from the rates charged to individual subscribers. The extent of these discounts for HSD distributors depends on a number of factors, including the following:

- Costs, types, and availability of competing programming
- Satellite location
- Volume
- Penetration
- Cost of detecting and eliminating piracy
- Copyright
- Administrative costs
- Fixed costs
- Variable and overhead costs
- DBS center obligation
- Cost of DBS center - related equipment
- Markets for Superstar's programming
- Types, number and style of programming packages
- Current promotions

⁸This alleged discrimination is clearly *not* a consumer issue. The rates available to HSD subscribers are lower than the average rates paid by cable subscribers. Superstar's "Superview" package of 24 popular satellite cable and satellite broadcast services retails for \$17.95 per month. The benchmark monthly cable rate for 24 regulated satellite channels on an MSO's 10,000 subscriber cable system, in an average income area, is 35% *higher* or \$22.32 per month. FCC Form 1200, Module C.

- Marketing programs and marketing strategy
- Authorization procedures
- Customer service requirements
- Software development and support
- Training

All of these items -- significant from a cost perspective and indicative of the differences in serving the HSD market -- justify price differentials.

II. Hollow Claims of Discrimination

The Commission has already devoted substantial effort to analyzing claims of discrimination in programming pricing like those asserted by NRTC and CSS. The first inquiry was conducted by the Commission at the direction of Congress in the Satellite Home Viewer Act of 1988, 17 U.S.C. § 119.⁹ At that time, the Commission found no evidence of discrimination, but held over for a second report analysis of discrimination concerning the rates charged for programming for home distributors versus cable operators.¹⁰ In the Second Report, the Commission reviewed, but refused to accept, the argument that the services provided the HSD market were "like" the services provided to cable operators, and found that

⁹Notice of Inquiry into the Existence of Discrimination in the Provision of Superstation and Network Station Programming, 4 F.C.C. Rcd. 3883 (1989).

¹⁰First Report, 5 FCC Rcd at 3313.

"substantial questions" were raised on this issue.¹¹ The Commission noted differences in copyright clearances and payments, as well as differences in the manner of scrambling and descrambling, which demonstrate further the differences in the services being provided. The Commission agreed that any costs incurred benefit all HSD distributors:

The carriers' claim that their national advertising is directed to all customers and thus benefits distributors by enhancing customer awareness of the programming has validity . . . part of the cost of advertising and promotion is therefore appropriately allocated to serving distributors as well as individual customers.¹²

The Commission also found that costs of providing customer service were difficult to allocate between wholesale and retail markets because carriers actually assist most distributors' customers.¹³ In addition, although some distributors do contribute to the anti-piracy effort, carriers overall contributions enhance the position of all participants in the HSD market and thus "it would not be appropriate, as suggested by NRTC, to allocate all anti-piracy costs solely to retail service."¹⁴ However, the Commission decided to leave final

¹¹Second Report, 6 F.C.C. Rcd at 3316.

¹²Second Report, 6 F.C.C. Rcd. at 3319.

¹³Id.

¹⁴Id., 6 F.C.C. Rcd. at 3320. In the Second Report, the Commission also found that the proper allocation of costs for transponders, up-link facilities and for providing for a rate of return and tax allowances would be appropriate. Clearly, these items would be part of any carriers cost-based justification, which none of the complaining commenters seem to consider relevant.

resolution of these issues to a pending complaint which had been filed by NRTC after the comment period, but before the issuance of the second report.¹⁵

The matter was left in limbo until Congress passed the 1992 Cable Act. After passage of the Act, the Commission commenced a proceeding for the implementation of Section 19 of the 1992 Cable Act, as well as the adoption of rules implementing the provisions concerning, inter alia, discrimination in the provision of cable and satellite broadcast programming.¹⁶ Superstar Satellite Entertainment participated in the rulemaking proceeding commenced by the Commission for the adoption of rules which were made effective for existing programming contracts in November 1993.¹⁷

In its Report and Order, the Commission revisited the discrimination allegations concerning superstation programming and it found that superstation programming is available and marketed to every type of multichannel video distributor, not just to cable television systems. Indeed, over 30 million cable, SMATV, and MMDS subscribers, and almost 1.5 million HSDs subscribe to Superstar's four superstations. These superstations are "available" to every single television household in the country.

¹⁵Id. ¶ 28. NRTC's complaint proceeding, while briefed and argued by satellite carriers, resulted in NRTC withdrawing its complaint in order to seek legislative relief.

¹⁶First Report and Order in Implementation of Sections 12 and 19 of the Cable Television Consumer Protection and Competition Act of 1992, 8 F.C.C. Rcd. 3359 (1993), recon pending. ("Report and Order").

¹⁷47 C.F.R. §§ 1000, et seq.

The Commission further found that satellite broadcasting programming vendors also face a unique, artificial ceiling on program prices which, combined with the comparative ease of entry for potential competitors seeking to offer the same signal, militated against the same type of discrimination allegations made here.

[W]e believe that certain practices involving price differentials benefit the public by increasing the availability of programming -- as well as reducing the price of service -- to consumers. For instance, we conclude that our Rules must allow for fundamental differences in pricing of satellite cable programming as opposed to satellite broadcast programming, because satellite broadcast programming vendors face a unique, artificial ceiling on program prices, as well as comparative ease of entry barriers for potential competitors seeking to offer the same signals.¹⁸

Apparently NRTC and CSS have forgotten the express purpose of the program access provisions in the 1992 Cable Act and the Commission's regulations. Those rules were not intended to eliminate all price differentials or to increase the HSD distributor's profit margins. Rather, the rules were intended to insure that in the absence of competition, pricing was not discriminatory. Competition clearly exists among satellite broadcast programming vendors and HSD distributors, and market entry is unrestricted. Indeed, the workings of a fully competitive market exists where, as here, competition -- not regulation -- is able to control pricing and practices. Moreover, because superstation programmers are non-dominant

¹⁸Report and Order, ¶ 100.

with respect to provision of their services, allegations of price discrimination must fail.¹⁹ In that regard, the fact that price differentials exist does not establish discrimination; rather, price differentials offered by superstation programmers lacking market power are indicative of *competition*, not price discrimination.²⁰

Consistent with these principles, the regulations also allow for price differentials based on "actual and reasonable differences in the cost of creation, sale or delivery of programming" as well as differentials attributable to "economies of scale, cost savings, or other direct and legitimate economic benefits that are reasonably attributable to the number of subscribers served." 76 C.F.R. § 1002. Indeed, the Commission recognized expressly that service to HSD distributors

may be more costly than service to others using different delivery systems, such as cable operators, as additional costs are often occurred for advertising expenses, copyright fees, customer service, DBS authorization center charges, and signal security. The record indicates that these cost differences are particularly evident when providing programming services to HSD distributors who do not provide a complete distribution path to individual subscribers.²¹

¹⁹See Competitive Carrier Rulemaking, 95 F.C.C.2d 554 (1983).

²⁰See Competitive Carrier Rulemaking, 85 F.C.C.2d 1, 31 (1980).

²¹Report and Order, at ¶ 106 (footnote omitted).

The rules reflected these differentials by providing that

vendors may base price differentials, in whole or in part, on differences in the cost of delivering their programming service to particular distributors, differences in costs, or additional costs incurred for advertising expenses, copyright fees, customer service, and signal security. Vendors may base price differentials on cost differences that are within a given technology, as well as between technologies.²²

In response to these rules, and in conformance with marketing strategies, Superstar reviewed and revised the prices, terms, and conditions for its distributors. Although Superstar determined that its rates were consistent with the rules, Superstar, largely in response to competitive pressures, reduced its rates for HSD distributors in the range of 15 to 40 percent.

Notwithstanding these reductions, NRTC alleges that "cost differences to the carrier in serving different distributors are *de minimus* and cannot justify the pricing differences", and CSS does "not believe that there can be *any* reasonable justification for price differentials between HSD and other technologies."²³ Clearly their interests are to obtain lower rates to increase their own profits while not providing any added value for HSD subscribers. There is no indication that the rate reductions the distributors have received are being passed on to consumers. NRTC's and CSS' comments should have no effect on the Commission's report to Congress.

²²47 C.F.R. §76.1002(b)(2)(note).

²³NRTC Comments at 15; CSS Comments at 6.

III. Damage Remedies Are Neither Authorized Nor Appropriate Under the Program Access Rules

Some commenters have argued that the Commission should expressly include damage remedies for price differentials that violate the program access rules. However, in its Report and Order, the Commission found that in most cases, the only appropriate remedy would be to amend the agreement and prescribe pricing prospectively, and that at most, forfeitures under Title V would be appropriate.²⁴

Despite the Commission's clear intent to exclude damage remedies from program access rules, commenters have argued that the Commission should award damages for violation of the program access rules to help the distributors coerce lower prices from the programmers.²⁵ This argument should be rejected.

First, Congress did *not* direct the Commission to employ damage remedies. Although Congress authorized the Commission to order "appropriate" remedies, including the power to establish prices, terms and conditions, in 47 U.S.C. § 628(e)(1) Congress granted authority to the Commission to utilize only those "additional" remedies available under Title V, or any other provision of *this* Act. 47 U.S.C. § 628(e)(2). Damages can be awarded

²⁴In re Implementation of Sections 12 and 19 of the Cable Television Consumer Protection and Competition Act of 1992, 8 F.C.C. Rcd. 3359, 3420 (1993).

²⁵NRTC Comments at 11-12; CSS Comments at 6.

under Title II against communications common carriers but, because none of the programmers are "common carriers" subject to Title II, none of Title II's damage remedies are "available". As a result, the Commission has no authority to provide a damage remedy. "It is axiomatic that an administrative agency's power to promulgate legislative regulations is limited to the authority delegated by Congress."²⁶

Second, damage awards in Title II common carrier proceedings do not include the types of awards these commenters would like under the program access rules. In common carrier proceedings damages are not calculated as the difference between the rates charged to the complaining distributor and similarly situated competing distributors. The "difference between one rate and another is not the measure of damages. . . ."²⁷ The actual measure of damages in a common carrier proceeding is limited to the particular profits which are lost due to customers subscribing to a competitor's service.²⁸ These commenters, on the other hand, want the distributor to be able to recover the difference between the rate paid for programming and the rate, that the "favored" distributors paid, regardless of lost profits. Significantly, many of these same distributors have not passed on their cost savings to their customers. It would thus be wholly inequitable to force the program vendors to underwrite the distributors' profit margins by charging lower prices, while at the same time the distributors do not pass the savings on to their customers. Accordingly, because price

²⁶Bowen v. Georgetown University Hospital, 488 U.S. 204, 208 (1988).

²⁷I.C.C. v. United States, 289 U.S. 385, 389 (1933); Illinois Bell Telephone Co. v. American Telephone and Telegraph Co., 66 RR2d 919, n. 13 (1989).

²⁸I.C.C., 289 U.S. at 390.

differentials are not damages under Title II, the entire argument supporting the inclusion of a Title II damage remedy is without justification.

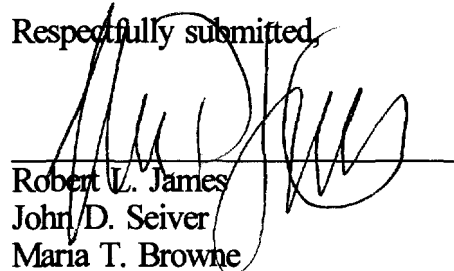
Moreover, refusing damage awards makes eminent sense. Here, the cable and HSD services are "unlike" one another ("likeness" being another prerequisite for recovery in a common carrier proceeding) and it would be purely speculative to assume that the price of programming charged to a distributor alone causes a customer not to subscribe to a particular technology for delivery of programming.²⁹ Accordingly, awarding damages – even as "lost profits" – would be purely speculative and not based on any business or market evidence. Most likely, a damage remedy would have the *in terrorem* effect of multiple complaints against multiple programmers, forcing a settlement regardless of entitlement to lower rates. The additional award of a damage remedy will only encourage such complaints, rewarding litigious distributors who need only file a short complaint with the Commission to avail themselves of lower rates.

²⁹Throughout the comments in the underlying proceeding for the adoption of the program access rules, vendors demonstrated that delivery of signals to cable operators is not "like" the service provided to HSD distributors who simply authorize billing and collect for services that carriers directly provide to HSD owners. To the extent that program access rules determine the degree of "likeness" for the purpose of comparison, the rules still provide justification for price differentials based on "offering of service," 47 C.F.R. § 1002(b)(1). As set forth in the comments and as set forth in the prior complaint proceedings, the additional costs and risks in serving the backyard dish market, including additional investment necessary to technically deliver, market, and make the service successful, differentiate the services that are being provided.

CONCLUSION

The Commission's report to Congress should identify the healthy state of competition in the HSD market. Isolated and unsupported allegations of discrimination and inconsistent positions with regard to damages and exclusivity are not relevant to the overall assessment.

Respectfully submitted,

A large, stylized handwritten signature in black ink, likely belonging to Robert L. James, is written over a horizontal line.

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July 29, 1994

EXHIBIT A

SUBSCRIPTION SERVICES

<div></div> <div>SERVICES</div>		PROGRAMMERS																<div></div> <div>SERVICES</div>		
		DISNEY (800) 303-5269	CANADIAN EXXSTASY (800) 455-2806/(800) 668-8999	ESPN (800) 233-ESPN	HBO DIRECT (800) HBO-DISH (426-3474)	NETLINK PROGR. (800) 642-8080 (24 hrs.)	PLAYBOY (800) 326-2500	PRIMETIME 24 (800) 883-7824	LIBERTY SAT. SPORTS (800) 766-7766	SHOWTIME SAT. NET. (800) 950-5100	SUPERSTAR SAT. ENT. (800) 225-5772 (24 hrs.)	SUR (800) 842-8908	TURNER HOME SAT. (800) 843-9266	TV ASIA (800) 458-8226	TV EROTICA (800) 559-3474/(800) 273-3008	TVN ENTERTAINMENT (800) 232-4TVN	VIEWER'S THEATER (800) 242-VEW	MYN SATELLITE (800) 458-0050	RURAL TV (800) 333-9711	TIMES MIRROR Call local Dimension Cable Co.
BASICS	A&E	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	A&E
	ALL NEWS CHANNEL									•					•		•	•	•	ALL CHANNEL NEWS
	AMC	•			•	•	•		•	•	•	•	•		•		•	•	•	AMC
	BRAVO	•			•	•	•		•	•	•	•	•		•		•	•	•	BRAVO
	CARTOON NETWORK				•	•	•	•	•	•	•	•	•				•	•	•	CARTOON NETWORK
	CNBC				•	•	•	•	•	•	•	•	•				•	•	•	CNBC
	CNN/HEADLINE NEWS	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	CNN/HEADLINE NEWS
	COMEDY CENTRAL	•			•	•	•		•	•	•	•	•		•	•	•	•	•	COMEDY CENTRAL
	COUNTRY MUSIC TV	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	COUNTRY MUSIC TV
	DISCOVERY	•			•	•	•		•	•	•	•	•		•	•	•	•	•	DISCOVERY
	FAMILY CHANNEL	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	FAMILY CHANNEL
	INTNTL. CHANNEL									•							•	•	•	INTNTL. CHANNEL
	LIFETIME	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	LIFETIME
	MTV/VH1				•	•	•		•	•	•	•	•		•	•	•	•	•	MTV/VH1
	NICKELODEON				•	•	•		•	•	•	•	•		•	•	•	•	•	NICKELODEON
	TNN	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	TNN
TNT***				•	•	•		•	•	•	•	•		•	•	•	•	•	TNT***	
TURNER CLASSIC MOVIES				•	•	•		•	•	•	•	•		•	•	•	•	•	TURNER CLASSIC MOVIES	
USA NETWORK	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	USA NETWORK	
WEATHER CHANNEL	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	WEATHER CHANNEL	
NETWORKS & SUPERSTATIONS	KDVR				•				•	•	•	•	•				•	•	•	KDVR
	KTLA	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	KTLA
	KTVT	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	KTVT
	NETLINK NETWORKS*	•			•	•	•	•	•	•	•	•	•				•	•	•	NETLINK NETWORKS *
	PRIMETIME 24*	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	PRIMETIME 24*
	TBS SUPERSTATION*	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	TBS SUPERSTATION*
	WGN-CHICAGO				•	•	•	•	•	•	•	•	•		•	•	•	•	•	WGN-CHICAGO
	WPIX	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	WPIX
	WSBK	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	WSBK
	WWOR	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	WWOR
PREMIUMS, SPORTS & PPV	CANADIAN EXXSTASY		•														•	•	•	CANADIAN EXXSTASY
	DISNEY	•			•	•	•	•	•	•	•	•	•				•	•	•	DISNEY
	ENCORE				•	•	•	•	•	•	•	•	•				•	•	•	ENCORE
	ESPN	•		•	•	•	•	•	•	•	•	•	•		•	•	•	•	•	ESPN
	ESPN2			•	•	•	•	•	•	•	•	•	•		•	•	•	•	•	ESPN2
	FLIX				•	•	•	•	•	•	•	•	•		•	•	•	•	•	FLIX
	HBO/CINEMAX	•			•	•	•	•	•	•	•	•	•				•	•	•	HBO/CINEMAX
	NEWSPORT				•	•	•	•	•	•	•	•	•		•	•	•	•	•	NEWSPORT
	NFL SUNDAY TICKET				•	•	•	•	•	•	•	•	•		•	•	•	•	•	NFL SUNDAY TICKET
	PLAYBOY				•	•	•	•	•	•	•	•	•				•	•	•	PLAYBOY
	PRIME NETWORK	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	PRIME NETWORK
	REQUEST TV				•	•	•	•	•	•	•	•	•				•	•	•	REQUEST TV
	SAT. SPORTS NETS.*	•			•	•	•	•	•	•	•	•	•		•	•	•	•	•	SAT. SPORTS NETS.*
	SHOWTIME/TMC				•	•	•	•	•	•	•	•	•		•	•	•	•	•	SHOWTIME/TMC
	SPICE/SPICE 2				•	•	•	•	•	•	•	•	•		•	•	•	•	•	SPICE/SPICE 2
	SPORTSCHANNELS				•	•	•	•	•	•	•	•	•		•	•	•	•	•	SPORTSCHANNELS
	SUR											•					•	•	•	SUR
	TV ASIA												•				•	•	•	TV ASIA
TV EROTICA II													•			•	•	•	TV EROTICA II	
TVN PPV									•							•	•	•	TVN PPV	
VIEWER'S CH. PPV				•	•											•	•	•	VIEWER'S CH. PPV	

*Combined Packages: Netlink Networks= KUSA & WFLG (ABC), KCNC & WBZ (NBC), KMGH & WUSA (CBS), KRMA (PBS), KWGN (Ind.); PrimeTime 24 = WABC (ABC), WRAL (CBS), WXIA (NBC); Sat. Sports Nets. = 16 sports services
SportsChannels = 8 regional sports services.***TNT may be subject to certain geographical restrictions. NOTE: Contact your satellite dealer to order subscription services, or call the numbers above.

SUBSCRIPTION SERVICES

PROGRAMMING DISTRIBUTORS	PHONE NUMBER	BASICS	NETWORK PACKAGES	SUPERSTATIONS	PREMIUM CHANNELS	ADULT SERVICES	REGIONAL SPORTS	SPECIALTY SERVICES	NFL	VC II PLUS VC-RS	VIDEO PAL PPV AVAIL
JONES SATELLITE PROGRAMMING	(800) 395-9555	17	2	ALL	5		YES				
NATIONAL PROGRAMMING SERVICE	(800) 444-DISH (3474)	18	2	ALL	5	2	YES	2	YES	YES	
1 CALL PROGRAMMING SERVICE	(800) 419-6100	20	3	ALL	5	4	YES			YES	YES
PROGRAMMERS CLEARING HOUSE	(800) 658-4770	21	2	ALL	5		YES	4	YES	YES	YES
PROGRAMMERS WAREHOUSE	(800) 844-6444	18	2	ALL	5	2	YES	2		YES	
SATELLITE RECEIVERS PROGRAMMING CENTER	(800) 432-8876	18	2	ALL	6	2	YES			YES	YES
SATELLITE SOURCE	(800) 477-1234	18	2	ALL	5	2	YES	1		YES	
SOUZA SATELLITE PROGRAMMING	(800) 767-3474	21	3	ALL	5	4	YES	1		YES	YES
TELE-MEDIA	(800) 966-8876	18	2	ALL	5	2	YES			YES	
TURNER VISION	(800) 344-6634 (24 hrs.)	24	3	ALL	9	4	YES	3		YES	

SUBSCRIPTION SERVICES

PROGRAMMING DISTRIBUTORS	PHONE NUMBER	BASICS	NETWORK PACKAGES	SUPERSTATIONS	PREMIUM CHANNELS	ADULT SERVICES	REGIONAL SPORTS	SPECIALTY SERVICES	NFL	VC II PLUS VC-RS	VIDEO PAL PPV AVAIL
A1 SATELLITE SERVICE	(913) 829-6007	12	2	ALL	5	2	YES			YES	YES
A&L PROGRAMMING PLUS	(800) 458-8728	20	3	ALL	6	3	YES	2			
ALL NETWORK PROG. SVCS.	(800) 844-8222	20	3	ALL	6	3	YES	2			
ADELPHIA HOME SAT. SERV. (AHSS)	(800) 662-2477	19	2	ALL	6	1	YES			YES	
ALL STAR PROGRAMMING	(800) 336-8716	19	2	ALL	6	2	YES				YES
AMERICAN PROGRAMMING SERVICE	(800) 876-8876	25	2	ALL	6	4	YES	4		YES	
COX SATELLITE PROGRAMMING	(800) 444-9293	20	2	ALL	6	1	YES	2		YES	
DISCOUNT PROGRAMMING CENTER	(800) 848-2858	17	2	ALL	5	2	YES			YES	YES
GALAXY SATELLITE PROGRAMMING	(800) 289-8876	20	2	ALL	6	2	YES			YES	